

To: Rumrill, Nancy[Rumrill.Nancy@epa.gov]
From: JAMES D WALKER
Sent: Fri 7/7/2017 9:29:03 PM
Subject: RE: Question on fhe Format for Cadmus comments on the revised Gunnison permit application

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>>>>>

Thanks, Nancy.

I noticed that the revised Attachment A-1 of the revised application provides for use of the outer observation wells, in addition to the CVWs, as monitoring wells during the post-rinsing period, contrary to what Excelsior said at the conference call yesterday. There must be some confusion and/or miscommunication between Excelsior staff members in that regard. In any event, observation wells will serve as EC monitoring wells after the early mine blocks are closed and others are activated because of the phased approach to mining, rinsing, post-rinsing monitoring, and closure operations. I plan to raise this issue to get clarification from Excelsior at the next conference call .

Have a nice weekend.

Jim

From: Rumrill, Nancy
Sent: Friday, July 7, 2017 2:34 PM
To: JAMES D WALKER
Subject: RE: Question on fhe Format for Cadmus comments on the revised Gunnison permit application

Hi Jim,

Here's the word document. This is fine to use the same format of the May 10 enclosure for comments. If there are additional comments, just add them to the same document citing the location in the revised application that is relevant to the comment. Please note any comment that needs resolving before a draft permit condition can be proposed or completed?

Thanks, Nancy



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From: JAMES D WALKER [mailto:jameswalker5@msn.com]

Sent: Friday, July 7, 2017 10:56 AM

To: Rumrill, Nancy

Subject: Question on the Format for Cadmus comments on the revised Gunnison permit application

Hi Nancy,

What is your preference for the format of our comments on the revised permit application and the response to EPA comments on the previous Excelsior responses?

I am planning to use the enclosure to the May 10 EPA letter to Excelsior as the format for insertion of our comments, similar to the format used to document our comments on the changes to Attachment R. Where changes to the application were not discussed in the May 10 technical comment enclosure but require comments, we will add those comments to the comment document.

I have annotated the revised permit application attachments with comments in the margins, but the comments are basically just placeholders. I am not able to insert comments directly into the text of the application without Adobe Acrobat software or a WORD version of the application. The same is true of the PDF Version of the May 10 technical comments enclosure, unless I use the Cadmus WORD version of the technical comment document. Can you provide the WORD version of the enclosure? If not, I can use the Cadmus WORD version, but the format and text would not be completely identical to the EPA version.

Overall, the revised permit application seems to be mostly responsive to previous EPA comments and concerns. There are some minor inconsistencies and clarifications needed, but that may not require changes to the application if Excelsior provides an acceptable response to the EPA comments on the revised application. The major issues of electrical conductivity monitoring and the observation well monitoring during the post-rinsing period remain to be resolved with Excelsior, but may be addressed as permit conditions after further discussion and/or proposals by Excelsior.

Thanks,

Jim